

Attachment G to Reply Comments

Verizon New England Inc.  
d/b/a Verizon New Hampshire

State of New Hampshire

Docket # DT 02-110

Respondent: Dr. James H. Vander Weide  
Title: Research Professor of Finance  
and Economics

Respondent: Alan Cort  
Title: Director – Regulatory

REQUEST: Freedom Ring Communications, L.L.C. d/b/a BayRing  
Communications and Conversent Communications of New  
Hampshire, LLC, Set #1

DATED: September 13, 2002

ITEM: BR/Conv. 1-10

Please refer to Dr. Vander Weide's Direct Testimony at page 32, line 11-10. Dr. Vander Weide states that, "the FCC's cost standard contemplates that the incumbent LEC will build a telecommunications network that is perfectly sized to meet the entire market demand for telecommunications services over the life of the network."

- (a) To what extent does Verizon deploy facilities to accommodate CLEC requests for UNEs?
- (b) Does Verizon deploy facilities upon a CLEC request for a given UNE and/or when there are no UNE facilities available?
- (c) Has Verizon specifically made separate network investments to provide UNEs to CLECs that would not have been made except for the need to service CLECs? If yes, please state the total amount of such investment both to Verizon consolidated, and to Verizon in New Hampshire.
- (d) If the answer to part (c) is yes, please provide a copy of all capital appropriation requests submitted to management to justify the requested investment.
- (e) Please provide all workpapers, source data, and any other Documents that support or are associated with parts (a) through (c) of the response.

REPLY:

Verizon NH objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Dr. Vander Weide's direct testimony at page 32, line 11, is a statement about the FCC's TELRIC cost standard, not a statement about Verizon NH's actual deployment of facilities to provide UNEs.

Without waiving this objection, Verizon NH provides the following response.

- (a) Verizon provides non-discriminatory access to Unbundled Network Elements where facilities are available and to the extent technically feasible.
- (b) No.
- (c) No.
- (d) Not applicable.
- (e) See Verizon New Hampshire's SGAT, Section 5.1 Access to Network Elements.

VZ #10